- end still. That still requires certification if we're
- 2 talking about a disability issue.
- And so we can kind of look at it, sit down with
- 4 the interested parties, have a good discussion and say,
- okay, where do things fit, what makes sense. Actually,
- 6 within Part 68 today we have certain things like passive
- 7 components, adapters, extension cords, and so forth that in
- 8 essence we say are a verification because we've said no
- 9 registration is required and the manufacturers asked to have
- test data on record that their complies, but nothing is
- required, so in essence we do have some grading system
- today. But I think if that's the choice, then we need to
- sit down within industry and have a good discussion on it.
- MS. MAGNOTTI: Mr. Shinn.
- MR. SHINN: John Shinn, Nortel Networks.
- 16 Again, I say as a large manufacturer, I make PBXs,
- but we also have a wide variety of telephone, everything
- from regular tops to smart telephones, if you will, pay
- 19 phones, credit card phones, a very wide variety. And rather
- than trying to put telephones as a TCB versus a PBX, which
- 21 is a large complex system, takes quite a bit of time to
- 22 test, evaluate, myself I would like -- and I have the
- laboratory, I have the equipment, I have the facilities, I
- 24 have the competence, I have the personnel to test the wide
- variety of things, and including the hearing aid

- 1 compatibility issues, the volume control issues coming up
- and other disability issues, and we're working very hard to
- make sure that those issues are addressed appropriately in
- 4 all of our products across the board.
- And so I don't see where I would be breaking out
- one group of products to go to a certain type of evaluation
- 7 and another product to be doing this. I would --
- 8 declaration of conformity, for me, would be -- across the
- 9 board would be the best way for me.
- 10 MS. MAGNOTTI: Mr. Salinas.
- MR. SALINAS: Yes. I'm Jimmy Salinas, SBC.
- As a carrier, I see all items that connect to my
- network, whether it's a small phone or a very large PBX, all
- have the same possibility of doing damage to the network,
- all have the same possibility of affecting the person next
- 16 to me, third party, all have the same possibility of
- 17 unbalancing the line and drawing and drawing high current
- into the line. So no matter how small the object or no
- 19 matter how large the object, I would prefer to see an
- 20 accredited lab test each one of those devices, whether it's
- done internally, externally, whether it's done with a TCB or
- 22 not.
- 23 And for the example given earlier several times
- 24 about the Part 15 associated with a personal computer that
- has variable combinations of possibilities, that's fine

- until you connect the modem, put a modem in that computer
- and then connect that computer to the line. Then you've got
- 3 to fall under Part 68 again. Even if I buy a computer that
- 4 already has a modem preexisting in it, there has to be paper
- 5 work telling me that that modem complies with 68; has
- 6 nothing to do with 15; has to do with 68.
- 7 So no matter how small the item or no matter how
- 8 large the item, they should all be tested the same because
- 9 they all have the possibility of damaging the network.
- MS. MAGNOTTI: Thank you.
- 11 Any -- yes, Mr. Pinkham.
- MR. PINKHAM: Clint Pinkham, Thomson Consumer
- 13 Electronics.
- 14 I've been trying to sit here and not say anything
- 15 today but I get to a point.
- 16 From a manufacturer's standpoint, I have to
- 17 reiterate that from a product performance standpoint, from a
- test and measurement standpoint, it really doesn't make any
- difference to us whether it's verification, certification,
- 20 DOC or TCB. We have make a product that works, that
- 21 works with the syste We have to take that data, we have
- 22 to keep it on file.
- The differs se to us is whether or not we have to
- 24 go through some administrative procedures to have this
- animal certified before we can bring it to market.

1	Jimmy mentions on many occasions that the networks
2	have a fear that there is going to be equipment out there
3	that basically brings down the network, and we have that
4	fear too. Without the network, we can't sell telephones.
5	Let me reiterate that we have to make the
6	measurements, we have to stand behind that product
7	regardless of the level we're talking. Our concern is one
8	of time to market. We want to take a system that allows us
9	to get new technology or even existing technology,
10	modifications of existing products, to market as soon as
11	humanly possible. This, to us, is big money.
12	We're not talking just a few bucks to pay to a
13	certified laboratory or a certification fee. We're talking
14	about the difference in costs between a new product and an
15	old product times the number of those products that might be
16	sold during the period when we can't get it to market
17	because we're going through a certification process.
18	I guess I get a little upset when I hear the talk
19	about trust, or where the manufacturers go, and we're going
20	to do strange and horrible things.
21	I mentioned yesterday the concept of building on a
22	risk basis, which was misinterpreted to mean that we would
23	go ahead and manufacture, and if the product did not meet
24	specs, we would then ship that product that did not meet
25	spec. That's not the risk that I'm talking about.

1	The	risk	we	face	is	we	go	ahead	and	manufacture

- 2 before the tests are complete, and if we blow it, we rack
- and stack that crap, and then rework it. That's a big cost.
- 4 We don't ship it.
- I guess I pretty much got that off my chest.
- 6 Thanks for the opportunity.
- MS. MAGNOTTI: Okay, thank you.
- 8 Mr. Whitesell.
- 9 MR. WHITESELL: Thank you. Steve Whitesell, Lucent
- 10 Technologies, Consumer Products, and I emphasize the
- "Consumer Products" because we're making telephones,
- answering systems, those sorts of products, as distinguished
- 13 from PBXs.
- The laboratory that I've been associated with has
- been in the business of testing these products since the
- beginning of Part 68. It moved from Indianapolis to New
- Jersey, but it still has that capability.
- 18 So from that viewpoint, we are not a certified
- 19 laboratory, and I believe that we are a competent laboratory
- and can continue to do that testing, and so the verification
- 21 process is one that I would prefer.
- However, if the Commission decides not to allow
- the verification process, then I would prefer very much not
- 24 be pinned to one or the other of TCB certification or
- declaration of conformity, but I would rather be allowed to

- do either of those processes on the presumption that, first
- of all, what we're looking for there, if we decide not to do
- 3 verification, is some third party certification of
- 4 something. In the case of requiring certification of the
- laboratory in order to do declaration of conformity, we're
- asking for a third party certification of the competence of
- 7 the laboratory whereas in the TCB process we're allowing my
- 8 laboratory to continue to do the testing, but then having a
- 9 third party certification of the test results and presumably
- 10 maybe of the test procedures that I use. So there is -- in
- 11 either of those cases, there is a third party certification
- that if the Commission feels is necessary, I would prefer to
- have the option rather than being confined to one or the
- 14 other.
- Thank you.
- MS. MAGNOTTI: Thank you.
- Ms. Wride.
- MS. WRIDE: This is Anh Wride, CCS.
- Just wanted to make the point that when we talk
- about trust, it is not so much that we don't trust the
- 21 manufacturers, you know. It's more like to protect the
- integrity of the system in the case that there are
- 23 manufacturers who do not have -- suppliers who do not have
- 24 headquarter presence in the U.S., for example, who may find
- it desirable or, you know, to meet their ends to bypass the

1	system.	Certainly	that	will	in	the	end	hurt	the
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- 2 conscientious manufacturers as well, because they play by
- 3 the rule where the other ones do not.
- 4 MR. BERRESFORD: Mr. Shinn.
- 5 MR. SHINN: Again, John Shinn, Nortel Networks.
- As it's very obvious, I support the declaration of
- 7 conformity. In listening to the comments and conversation,
- 8 and I see that the TCB as being a viable alternative for --
- 9 as Anh had indicated -- offshore manufacturers and people
- 10 who are small manufacturers who really can't support their
- own labs, and who probably don't have, or do not have the
- expertise for the testing and probably need help. And I
- think the third party could be a good, viable solution for
- them, and so between the SDOC and the TCB, which I don't see
- as my using it, but I see it as something that could be of
- use, and during the transition period it's possible that
- they may be -- may find it not be viable, and as a
- transition, and I would go for the declaration of
- 19 conformity.
- 20 MS. MAGNOTTI: Any other comments? Okay.
- MR. BERRESFORD: Thank you.
- 22 Does anyone else on this table have any other
- 23 questions or comments to make?
- 24 MR. VARMA: John, not on this issue, do we have
- any questions of the panelists? I had some other area that

- 1 I wanted to get into.
- 2 MR. BERRESFORD: No, I don't.
- MR. VARMA: I think we had a good discussion when
- 4 the points were made that there has to be the force and
- 5 effect of law; that the FCC has to hang in there; that there
- 6 has to be some sort of an enforcement mechanism.
- 7 The general question that I would like to raise at
- 8 this point for comments from anyone is that as we shift into
- 9 a new paradigm, and as we privatize as much of Part 68 as we
- 10 possibly can, do you envision any changes to the enforcement
- 11 mechanism that we ought to consider? Should we leave the
- 12 enforcement mechanism the way it is? Should we strengthen
- 13 it? Should we change it?
- So the general issue that I put before you for
- 15 consider is what do we do as far as enforcement is
- 16 concerned? Any changes?
- 17 Trone.
- 18 MR. BISHOP: Trone Bishop with Bell Atlantic.
- 19 Number one, I would say the present system
- 20 requires -- because the FCC is acting as people have
- 21 characterized it, as a gatekeeper, I see very little
- 22 enforcement is needed from the FCC.
- So if you change, if you eliminate the FCC as the
- 24 gatekeeper, I don't see any recourse other than the FCC to
- increase the number of people devoted to enforcement of

1	these	rules.	That's	why,	in my	y opinion,	I	don't	see	how	you
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- can -- to me, it would always take fewer people to be the
- gatekeeper than to do enforcement. However, I understand
- 4 that that increases the time to market and has other types
- of disadvantages that people have talked about.
- 6 So I would think if you're going to -- that
- 7 enforcement is going to require a lot more resources than
- 8 you've devoted to it so far.
- 9 MR. VARMA: So do you still though that there will
- 10 be a gatekeeper DSO, there will be a TCB, and things would
- actually filter through those before they reach the FCC for
- 12 enforcement purposes?
- MR. BISHOP: Well, I do see in the TCB process
- 14 that there -- the TCB then becomes the gatekeeper. Some of
- the other processes, there is essentially no gatekeeper, so
- 16 that's why I think it increases the risk of nonconforming
- 17 equipment and would require greater enforcement effort in
- 18 the long run.
- MR. VARMA: So in this one area, I suppose, the
- 20 role of the FCC might possibly have to be increased even as
- we are trying to decrease the FCC's role in the other areas?
- MR. BISHOP: That's my opinion, yes.
- MR. VARMA: Okay, so you see no opportunities for
- us not to have to increase our enforcement function and
- 25 resources?

1	MR. BISHOP: No. In fact, you know, this
2	particular forums we set aside things like hearing aid
3	compatibility and volume control and those sort of issues
4	which there are rules in Part 68 for. We set that aside and
5	said we're not going to talk about that because you're not
6	going to consider dropping that.
7	Then we but that is an area that you may well
8	find you're going to need to enforce that because it's a
9	critical area. You're going to have possibly more
10	complaints from certain consumer segments over products. So
11	I think when you factor that into it, and also, we there
12	are products being there are companies that are having
13	trouble meeting these particular hearing aid compatibility
14	requirements and volume control. So I think it's an area
15	that if we go to the declaration of conformity or some type
16	of verification, I think you're going to see products out in
17	the marketplace that not only have the potential for harm,
18	but they have this potential for not complying with the
19	hearing aid compatibility and volume control rules.
20	MR. VARMA: Okay. Anh?
21	MS. WRIDE: I just wanted to say that if the FCC
22	is going to not certify products in the future and, you
23	know, allow either going to the TCB program or the SDOC
24	program, you can the resources that you are devoting
25	right now to do registration can be redirected towards

1	enforcement,	but maybe	you are	thinking	of a	bigger,	bloated
2	program of e	nforcement,	and may	be that's	not	necessar	ту.

You know, all you need to do is just have a

program but with the perception out there that big brother

is watching, and like someone mentioned yesterday, it's

amazing how we -- how we do things right when we know

someone is watching, and that's the only thing that is

probably needed, and not so much, you know, going out, you

know, market surveillance in big droves, perhaps that's not

necessary.

MR. VARMA: You know, and as Kurt mentioned earlier, we are really strapped for resources, and there have been some requests for waivers that we have not been able to act in an expeditious manner.

What I would hope and prefer to see is reallocation of our resources currently devoted to Part 68 to other priorities that we have before the Bureau, as well as before the Network Services Division, as opposed to reallocating those resources for Part 68 functionalities. Otherwise, we would never be able to do some of the other things in a timely manner that are before us.

So if there is any opportunity for us at all to explore the possibility of reducing FCC's resources devoted to Part 68, not only in terms of certification but also enforcement, I think I would like to invite any thoughts on

1	that	issue.

2	Bill?
<i>l</i> .	BIIII

3 MR. HURST: Yes. Bill Hurst.

As we look at the TCB program, one of the criteria placed on TCBs is to participate in market surveillance, and there are certain requirements placed on them, and so a portion of that can then be moved to those private entities through that mechanism.

The systems of declaration of conformity and verification are very dependent upon a very strong market enforcement. If you look at the European model, here in Washington two months ago the German government came and presented what they were doing enforcement for EMC, and they were talking about hundreds of people within the German system enforcing the EMC regulations, and that's what allows the market declaration of conformity to work, so that the market surveillance is what allows these lesser oversight systems to work.

My concern is that the FCC does not have the resources to do that, and so we need to look at the private system to make sure that we come to the challenge and ensure the integrity of that. And so I believe that becomes a rule that the TCBs can provide that type of activity, and perhaps we can even expand what they have been asked to do within this moment within Docket 98-68.

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1	MR. VARMA: Okay, thank you.
2	John.
3	MR. SHINN: Thank you. John Shinn, Nortel
4	Networks.
5	Again, as I stated yesterday, and today also, the
6	enforcement activities of the FCC I feel should be much more
7	visible, and my it's my understanding, I may be wrong,
8	but it's my understanding that the enforcement primarily is
9	responding to complaints. When you get enough complaints,
10	you do something.
11	I would sort of like to point to a different
12	issue. As I mentioned yesterday, a Mr. Hollingsworth within
13	your FCC organization who is dealing primarily with the
14	amateur radio service, him and one other gentleman, I can't
15	recall his name, but have created a you know, have done a
16	lot in the visibility. They have worked with the amateur
17	community as I would assume that the enforcement people
18	would work with the manufacturers and importers of
19	telecommunication equipment. He's created a lot of good
20	will, and he's created an environment where people know that
21	the enforcement is out there. He's advertising the fact
22	that he's going to shut you down if you don't comply, and as

a result you're going to find -- you're finding good will

with the people who are really -- the good people that are

doing the things they are supposed to do. They like the

23

24

25

- idea, and with one or two people you've done a tremendous
- job in enforcing the amateur radio service. And I think
- 3 that this could be done in a similar fashion within the Part
- 4 68 group with the limited amount of resources that you do
- 5 have without having to put a lot of resources, and it's a
- lot of how we do it rather than just getting a bunch of
- 7 people out there and going for it.
- 8 Thank you.
- 9 MR. BERRESFORD: Yes, Jimmy?
- MR. SALINAS: Yes, sir, Jimmy Salinas,
- 11 Southwestern Bell.
- 12 It's an issue, as John stated, that you need to be
- out there and letting people know that you will react and
- that you will do the enforcement. Within the industry,
- whether it's a DOC verification or TCB, the industry knows
- how to report the complaints. They know what procedures
- 17 they have to follow.
- 18 As shown in the report where you all have a report
- 19 card of how the telecommunication industry is doing earlier
- this year, the majority of your report is to the consumer
- and the consumer does not know that path to go to to the
- TCB, to go to the standards group, to go to the DOC. They
- 23 are going to come to you. You're going to -- that's where
- your major problem is going to be, and that's where you're
- 25 going to have to put a lot of your enforcement power. The

- industry doesn't need that.
- 2 You need it because the consumer is doing it, and
- with a change in the technology and with less and less
- 4 people understanding the new technology, the first thing
- 5 they are going to do is they're going to call their local
- 6 provider, and if they get no help from their local provider,
- 7 they will go to their local municipality. If that's not
- 8 allowed, the PUC, the next thing is the FCC, and your
- 9 trouble reports from the consumer have increased
- tremendously, and that side of the house, yeah, you're going
- 11 to be in the business for a long time because the FCC is the
- 12 final call that the lady living on the corner of 5th and
- 13 Main has.
- MR. BERRESFORD: Mr. Bipes.
- MR. BIPES: John Bipes, Mobil Engineering.
- A short answer to your question on enforcement is
- in the meantime, however that might be defined in the
- 18 present time, if FCC would refrain from giving the
- impression to the industry that it doesn't care and it
- 20 shouldn't take too much time or resources to do that, that
- 21 will allow those of us who are consultants and test labs and
- so on to continue to communicate the idea that it does
- 23 matter; that Part 68 still is something that needs to be
- reckoned with, and I find that the people with whom I work,
- if I can say that it matters and that the FCC is behind us,

- that accomplishes the purpose.
- MR. VARMA: Any other comments on the broad issue
- 3 of enforcement?
- 4 Thank you, John. Back to you.
- 5 MR. BERRESFORD: Thank you.
- Are there any other comments on any subject?
- 7 Mr. Bipes.
- 8 MR. BIPES: John Bipes, Mobil Engineering.
- I want to give a bit of a perspective. I don't
- 10 know if 15 years working with Part 68 authorizes me to do
- 11 that. If not, I can tell you that I came to
- 12 telecommunications about 25 years ago when I began working
- 13 with cellular design. Nonetheless, I will give a little bit
- 14 of a perspective.
- It seems to me that telecom versus many other
- 16 technologies that impact upon our society has in fact been
- on a greater slope of acceleration, improvement, speed,
- information, than almost any other aspect that affects our
- 19 lives. I think that that has to be kept in mind. I would
- 20 quess that it's maybe in some cases outstripped our other
- 21 meaningful technologies by a rate of 10 to one, and it seems
- 22 as if there is an interest in making it 100 to one.
- The wisdom of doing that, I don't know. When I
- 24 get on an airplane and I see a fellow that can't put his
- 25 cellular phone in his picket but has to conduct business,

1 walking down the aisle, strapping on his seat belt, I lame	1	walking	down	the	aisle,	strapping	on	his	seat	belt,	I	lame
--	---	---------	------	-----	--------	-----------	----	-----	------	-------	---	------

- that I was involved in the development of cellular phones in
- 3 the first place. I had some prediction that a person would
- 4 no longer have any privacy either in the car or in the
- 5 bathroom if cellular phones became what they are today, and
- 6 I think I was at least partially correct.
- We've had historically the best of governmental
- 8 involvement with industry, the FCC and the industry,
- 9 particularly the TIA, with which I have firsthand
- 10 experience. I think that's nothing that we should be
- embarrassed about or make apologies for, and that's in the
- 12 last 15 years.
- I have a brother who works with the FAA and he
- finds that the way that the FCC works with its constituent
- industry is almost a model of very good working together
- 16 cooperation, forming a consensus, avoiding heavy-handed
- dealings one with the other. I think it's been in spite of
- 18 the complaints that we hear for dollars or the five weeks of
- 19 time it might take to grant a registration, from my own
- 20 point of view I think it's been a reasonably minimal
- 21 hardship. There has been economic hardship. I think there
- 22 has been reasonably minimal economic hardship. Hardship in
- 23 terms of safety, I think there have been few lives lost,
- very few people who have been electrocuted, and I think that
- 25 Part 68 has a lot to do with that in terms of safety to

t cetecom petpointer	1	telecom	personnel	
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I think it's been a minimal expense to the FCC

when in my simplistic view I take a look at the fees that

are supplied by registration applicants versus the amount of

dollar costs that it must take for the FCC to administer the

program, it seems to me to be about a wash.

Now, I know in fact that the FCC cannot operate on
that same basis. I think the FCC operates on governmental
allocation and the fees go into an entirely different
category, but at least in terms of dollars in versus dollars
out, it seems to me as if it's comparatively selfsupporting.

Now, having said all of those positive things from a perspective, from a historical perspective, I do want to say that there are some things that really could change, and one of those that has surfaced time and again is the length of time it takes to change the rule.

In the last 10 or 15 years, we've had what we call the official rule and the unofficial rule. The unofficial rule is the interpretation of the rule that appears in the Part 68 registration guide. I've sometimes had trouble breathing thinking about what might happen if push came to shove in a court of law with regard to an official rule versus an unofficial rule. Hopefully, that can come onto higher ground and the official rules can change much more

1 quickly.

I would recommend at this point that with 98-68 being apparently the continuum that we are on, that we would 3 continue in that direction; that as an SDO, that my greatest familiarity is with TIA, particularly TR-41.9 under the very capable leadership of Anh Wride, that that industry forming consensus be relied upon to be the place where everybody 8 goes for interpretations of db's volts and microseconds issues on a rather timely basis. We meet on a quarterly 9 basis, and, in fact, even between those quarterly meetings 1.0 there is a telecom network of people who can help solve 11 problems, interpolate between the particular portions of the 12 13 Part 68 rule, and continue FCC involvement with the SDO. Τf it should be TIA, fine, but nonetheless continue the FCC 14 15 involvement. 16 And I think, in summary, what I'm trying to say is we shouldn't make too many apologies for what we have done 17 18 so well already. Stay the course. Make changes, make positive changes. Be careful because step changes of a 19 large magnitude can have destabilizing effects, and those 20 21 are my thoughts.

Thank you.

MR. BERRESFORD: Thank you.

24 Any other comments in closing?

25 Ms. Wride?

1	MS. WRIDE: Yes. I just wanted to just speak up
2	on what John said, that TR-41.9 and TIA, the other TR-41.11
3	and TR-41.2 are very ready to help the FCC in any which way
4	we can, technically and administratively to help you in this
5	need, in this privatization effort.
6	MR. BERRESFORD: Mr. Bishop.
7	MR. BISHOP: Trone Bishop with Bell Atlantic.
8	My good friend, Bill McNamara from Bell South had
9	to go catch an airplane and so he asked me to put in a plug
10	for the Bixy wiring petition that the FCC has been
11	considering for a number of years which hasn't acted on yet,
12	and that is related to this matter here in that there are no
13	rules in Part 68 that require a twisted pair on the customer
14	premise, so non-twisted pair can be used, has been used, and
15	is known to cause cross-talk problems, which we believe
16	harm, can even be shown to harm third parties.
17	In a related matter, this wiring is substandard
18	and not sufficient for the new advanced technologies that
19	the manufacturers and carriers want to introduce to the
20	public.
21	And so we feel that, and the Bixy wiring petition,
22	if you look at it, it had no dissenting commenters at all,
23	and it would it asks that the that it be made
24	mandatory in Part 68 that wiring on customer premise be a
25	minimum of Category 3 twisted pair wiring as defined by the

- 1 industry.
- 2 And so Bill was sorry he couldn't be here. He had
- 3 to go catch his plane, but he wanted me to put in a plug for
- 4 the Bixy petition. I want it to be on the record that I did
- 5 so.
- 6 Thank you.
- 7 MR. BERRESFORD: Thank you.
- 8 Any further comments?
- 9 (No response.)
- One or two notes in closing.
- First of all, I would like to thank you all for
- coming here, particularly those who came from far away.
- This has been extremely helpful to us. I'm sure I speak for
- 14 everybody here.
- Second, we will be happy to receive a further
- round of written comments if anybody would like to make them
- on or before the 20th of this month. That is a week from
- 18 today.
- And finally, if I could just make a personal
- 20 observation. With all of the comments that have been made
- 21 about the need to protect the network and to maybe to go
- 22 cautiously rather than with all prudent speed in changing,
- 23 many of us have talked about how we've made a very good
- living off of Part 68 for 20 or 25 years, and when Part 68
- 25 was created the public switched phone network was the only

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way for the people of this country to send switched voice
 1
      and data traffic. That is not the case anymore.
 2
                                                        There are
      not terrestrial wireless networks, there is satellite
 3
      networks, cable TV networks are starting to handle voice and
 4
 5
      data switched traffic, and there are more high bandwidth
 6
      networks being built. And so it seems to me that the public
 7
      switched phone network has competition now.
 8
                And when you are the only network, you can have
 9
      maybe 100 pages of rules in the CFR. But some of these other
10
      networks, I'm told, have as few as two. And if connection
      to the phone network continues to be harder than connection
11
      to other networks, traffic will leave the phone network and
12
      will go to those other networks.
13
14
                And so there can be a point at which a network
15
      protects itself into obsolescence, and I would just ask us
16
      all to bear that in mind too.
17
                Thank you all very much for coming again.
18
                (Whereupon, at 12:00 Noon, the public fora was
19
      adjourned.)
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## REPORTER'S CERTIFICATE

FCC DOCKET NO.: N/A

CASE TITLE: PUBLIC FORA ON DEREGULATION/PRIVATIZATION

HEARING DATE: July 13, 1999

LOCATION: Washington, D.C.

I hereby certify that the proceedings and evidence are contained fully and accurately on the tapes and notes reported by me at the hearing in the above case before the Federal Communications Commission.

Date: 7-13-99\_\_\_ Sharon Cook

Official Reporter

Heritage Reporting Corporation

1220 "L" Street, N.W. Washington, D.C. 20005

## TRANSCRIBER'S CERTIFICATE

I hereby certify that the proceedings and evidence were fully and accurately transcribed from the tapes and notes provided by the above named reporter in the above case before the Federal Communications Commission.

Date: 7-20-99 Joyce Boe

Official Transcriber

Heritage Reporting Corporation

## PROOFREADER'S CERTIFICATE

I hereby certify that the transcript of the proceedings and evidence in the above referenced case that was held before the Federal Communications Commission was proofread on the date specified below.

Date: \_7-22-99\_\_ Lorenzo Jones

Official Proofreader

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